

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

In re CREDIT SUISSE – AOL  
SECURITIES LITIGATION

Case No. 1:02 CV 12146  
(Judge Gertner)

This Document Relates To:

ALL ACTIONS

**PLAINTIFFS' MOTION TO PRECLUDE THE EXPERT OPINIONS OF  
RENE M. STULZ AND JOHN DEIGHTON**

Lead Plaintiff Bricklayers and Trowel Trades International Pension Fund, on behalf of itself and the Class ("Plaintiffs"), respectfully moves pursuant to Federal Rules of Evidence 702 and 403 to preclude the expert opinions of Professors René M. Stulz and John Deighton, the proposed expert witnesses of Defendants Credit Suisse Securities (USA) LLC, Credit Suisse (USA), Inc., Frank Quattrone, Elliot Rogers, Jamie Kiggen and Laura Martin ("Defendants"). The grounds for this motion are explained in detail in the accompanying Memorandum of Law.

**REQUEST FOR ORAL ARGUMENT**

Under Local Rule 7.1(d), Plaintiffs request oral argument.

DATED: June 5, 2009

Respectfully Submitted,

KAPLAN FOX & KILSHEIMER LLP

/s/ Frederic S. Fox

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